

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

DR. PAUL ROYSDON,

Plaintiff,

v.

UNITED STATES OF AMERICA, et al.,

Defendants.

Civil Action No. 5:22-CV-00869-JKP-HJB

**JOINT PRETRIAL ORDER
EXHIBIT 2 – DEFENDANTS’ EXHIBIT LIST**

Defendants file this designation of exhibits under the Court’s Amended Bench Trial Scheduling Order (ECF No. 99), the Federal Rules of Civil Procedure, and Local Rule 16(f)(4).

Ex. No.	Description	Will Offer	May Offer
D-1	Beall Email Sending OSI Form 40 (Aug. 27, 2020)	X	
D-2	OSI Form 40 (with attachments)	X	
D-3	McVeigh Email Chain RE: MFR for Dr. Roysdon Please	X	
D-4	Ekholm Memo For Record (Aug. 21, 2020)	X	
D-5	Burghard Email Chain Re: Dr. Paul Roysdon.... Need to talk sooner than Thurs (Aug. 24, 2020)	X	
D-6	McVeigh to Brown Re Dr. Roysdon MFR (Aug. 19, 2020)	X	
D-7	Brown to McVeigh sending NSA Altered Email (Aug. 20, 2020)	X	
D-8	Bremer Appointment Email (Aug. 26, 2020)	X	
D-9	Bremer Appointment Letter (Aug. 25, 2020)	X	
D-10	Bremer Email Sending Report (Sep. 22, 2020)	X	
D-11	Bremer Report (Sep. 22, 2020)	X	
D-12	McVeigh to Bremer re FOUO\Statement (Sep. 11, 2020)	X	
D-13	McVeigh Statement	X	
D-14	August 24, 2020 Email Chain re paperwork	X	
D-15	McVeigh to Beall and Burghard Email FW: Government/Contractor Role - Excalibur (Aug. 24, 2020)	X	
D-16	McVeigh to Beall et al re FOUO\Letter copy on NIPR (Aug. 25, 2020)		X

D-17	Parisi Full Email Chain (Aug. 25, 2020)		X
D-18	McVeigh to Ranft et al re Roysdon PMR info + attachment (Aug. 28, 2020)		X
D-19	Inquiry Official Briefing Meeting Invite (Aug. 27, 2020)	X	
D-20	McVeigh to Beall, Ranft, Bremer re Jaspers (Sept. 1, 2020)	X	
D-21	McVeigh to Bremer (Sept. 2, 2020)	X	
D-22	Bremer to McVeigh (Sept. 3, 2020)	X	
D-23	McVeigh to Beall Email re Fib DD254 (Aug. 19, 2020)		X
D-24	Bremer Extension Request (Sep. 9, 2020)		X
D-25	Ekholm to R. Brown re Request for Investigating Officer (Aug. 25, 2020)	X	
D-26	Leidos Meeting Invite (April 14, 2023)	X	
D-27	Leidos Meeting Invite (March 27, 2023)	X	
D-28	Email Chain with Beall, Brown, McV, et al. re RE Fib DD254 (Aug. 20, 2020)		X
D-29	Group Texts with Roysdon re PMR (Feb. 2020)	X	
D-30	Roysdon Memo to Leidos (undated)		X
D-31	Bremer to McVeigh Email (Oct. 6, 2020)		X
D-32	HNCO Security Team Email Chain re Roysdon write-up (Aug. 27, 2020)		X
D-33	Morin to Bremer re Inquiry Official Letter (Aug. 27, 2020)		X
D-34	Rowe to Ekholm re Request for Investigating Officer (Aug. 26, 2020)		X
D-35	Beall to Burghard Email re Roysdon Debrief (Aug. 28, 2020)	X	
D-36	Email Chain with McVeigh and AFRL re Tech SME (Aug. 18, 2020)		X
D-37	Jaspers to Brown re Leidos - Research (Jan. 26, 2020)		X
D-38	Ratermann to Roysdon (Feb. 2, 2023)		X
D-39	Ratterman to Roysdon (Mar. 27, 2023)		X
D-40	Jaspers to Gan, et al. (Apr. 3, 2023)		X
D-41	Jaspers to Brown re Cyber AI Cheatsheet (Apr. 5, 2023)		X
D-42	Jaspers to Brown, et al. (Apr. 10, 2023)		X
D-43	Roysdon to Ratermann Email (Apr. 12, 2023)		X
D-44	Capt. Gan to Jaspers Re Leidos Capability (Apr. 12, 2023)		X
D-45	GITI Consulting Agreement		X
D-46	GITI Task Order (June-Sept 2019)		X
D-47	GITI Task Order (October-December 2019)		X
D-48	GITI Modification (June 2020)		X
D-49	NSA Emails		X

D-50	StarNav Invoices		X
D-51	OIG Hotline Report Completion		X
D-52	GITI Monthly Report Summaries		X
D-53	Email Chain re NEED TO TALK SECURITY		X

Defendants reserve the right to offer additional exhibits for impeachment, or as necessary for rebuttal or to refresh a witness's recollection. Defendants further reserve the right to introduce any exhibits used or identified by Plaintiff.